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Mr. Roger Stanley
Hanford Project Manager
Washington Department of Ecology, PV-11
Olympia, Washington 98054

Dear Mr. Stanley:

DISPOSITION OF THE 183-H SOLAR EVAPORATION BASIN PURGE WATER

Reference: Memo, from Marcia Williams, Director of the Office of Solid Waste, the Environmental Protection Agency - Headquarters, to Patrick Tobin, director, Waste Management Division, Region IV, "RCRA Regulatory Status of Contaminated Ground Water", November 13, 1986.

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The Department of Energy - Richland Operations Office and the Westinghouse Hanford Company are requesting concurrence from the Washington State Department of Ecology for the disposition of the purge water from under the 183-H Solar Evaporation Basin. The final disposition of contaminated groundwater potentially contaminated by listed waste leachate at the Hanford Site has been an issue for the last several years. The Washington State Department of Ecology has verbally asserted that the purged groundwater from under the 183-H Solar Evaporation Basin is listed waste because the groundwater contamination can be traced to small quantities of listed constituents disposed of in the Basin in 1986. 1976 & 1977.

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If this groundwater is listed waste, waste management options regarding storage or disposal of this groundwater would be limited to storage in barrels. Heated storage space is not available for the storage of all contaminated groundwater generated in aquifer testing, well development/construction, or well sampling activities. Off-site hazardous waste treatment facilities cannot treat the ground water because of the radionuclide contamination and the on-site disposal or storage facilities could not dispose or store of the groundwater because it would be a listed waste.

It is the contention of the Department of Energy - Richland Operations Office (DOE-RL) and the Westinghouse Hanford Company (WHC) that the ground water beneath the 183-H Basin is not listed waste based on the interpretation presented by Ms. Williams in the above referenced memo. In her memo, Ms. Williams states:

"ground water containing a listed hazardous waste, once collected, is subject to regulation under the hazardous waste regulations. However, if as a result of treatment, the ground water no longer contains the hazardous waste leachate, the ground water would no longer be subject to the hazardous waste rules."

The groundwater under the 183-H Basin does not contain detectable levels of the listed waste constituents disposed of to the Basin in 1976-1977 (i.e., approximately three gallons total of unused cyanide solutions, unused vanadium pentoxide solutions, and unused formic acid). Therefore, it is our interpretation of the Marcia Williams memo that the groundwater can be disposed of in a non-hazardous waste liquid effluent disposal facility in a manner consistent with its radiological hazard in accordance with the WHC requirements for surface or subsurface disposal of liquid effluents.

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